

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)


**DEFENDANT GOOGLE LLC'S NOTICE OF  
MOTION TO RETAIN DOCUMENTS UNDER SEAL**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Kevin Lucas, and Declaration of Sara B. Tomezsko, Defendant Google LLC, through its undersigned counsel, hereby moves this Court, before the Honorable Gabriel W. Gorenstein, at the United States District Court, 500 Pearl Street, Room 6B, New York, New York 10007, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and the Stipulated Protective Order for the Treatment of Confidential Information dated February 4, 2020, (ECF 23), for an Order permitting it to retain under seal certain documents or portions thereof submitted in connection with Plaintiff Ulku Rowe's Reply in Opposition to Defendant's Response to Plaintiff's Pre-Motion Letter (ECF 97).

PLEASE TAKE FURTHER NOTICE that, Plaintiff's opposition, if any, shall be due on February 5, 2021, and Google's reply due February 8, 2021.

Dated: New Canaan, Connecticut  
January 29, 2021

PAUL HASTINGS LLP

A handwritten signature in black ink, appearing to read 'K. Gage', is written over a horizontal line.

By: Kenneth W. Gage  
Sara Tomezsko

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GOOGLE LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this 29 day of January, 2021, I caused a true and exact copy of the foregoing DEFENDANT GOOGLE LLC'S NOTICE OF MOTION TO RETAIN DOCUMENTS UNDER SEAL, MEMORANDUM OF LAW, and all accompanying declarations and exhibits to be filed electronically and served by mail on anyone unable to accept electronic filing. Notice and copies of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated: Jersey City, New Jersey  
January 29, 2021

  
Sara B. Tomczko